

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
**FILED**

**APR 26 2021**

Nathan Ochsner, Clerk of Court

**OLGA P. BLAKLEY, M.D., P.A.,  
NATALIE BLAKLEY, AND  
JULIA BLAKLEY**

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**NO. 4:20-cv-02962**

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**VERSUS**

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**JUDGE GEORGE HANKS, Jr**

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**NORMAND F. PIZZA AND**

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**MILLING BENSON WOODWARD LLP**

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**MAGISTRATE JUDGE EDISON**

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**PLAINTIFF OLGA P. BLAKLEY, M.D., P.A.,  
RENEWED MOTION TO RECONSIDER AND ALLOW DISCOVERY  
FOR THE TRIAL BY JURY.**

**TO THE HONORABLE JUDGE OF THIS COURT:**

**NOW INTO COURT**, comes Plaintiff Olga P. Blakley M.D., P.A., et al, and is respectfully submitting a Renewed Motion in accordance with Federal Rules of Civil Procedures 50(b), 52(a), 59 and 60, due to still pending entry of the order issued disposing remaining Motion to reconsider and allow discovery for the Jury Trial in the abovementioned case, that has been entered on the docket for 03/30/2021.

Plaintiff was denied a right to be fully heard on the issue by being denied an opportunity to participate in Pre-Trial conference, that the Plaintiff could not participate due to heart attack, and was prejudiced by that.

Repeatedly, the Plaintiff is respectfully requesting to be allowed Electronic Filing in the abovementioned case that has been requested numerous times and has been allowed to other Pro Se litigants, but has not been allowed to the Plaintiff in this case as evidencing prejudice as the adversary party has been allowed electronic filing in this case.

The grounds for reconsideration are outlined in the submitted motion docketed for 03/30/2021.

Therefore, the handling of this case should be reconsidered, and reassigned to another Judge for the trial in accordance with the right for the trial by jury as the case has been filed and paid for (Not for the unilateral decision and disposition by the judge), as the trial has not been conducted.

*IN ALTERNATIVE, I WILL CONSIDER FILING AN APPEAL.*

**Respectfully submitted,**

**Olga P. Blakley M.D., P.A. et al**

**on 4/23/21 via in court submission**

**(electronic submission has not been**

**allowed yet to a Pro Se Litigant - Woman  
after a Heart Attack)**

*Pro Se*

**s/Olga Blakley**

**Olga P. Blakley M.D., P.A.**

*Pro Se*

**c/o William R. Pakala**

**Attorney at Law**

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**Cc – via Email**

Chadwick W. Collings

**Certificate of Conference:**

On this 23-th day of April, 2021 the renewed motion to reconsider was communicated to the opposing counsel Mr. Chadwick Collings in writing as below per his request.

*s/Olga P. Blakley*

**Olga P. Blakley M.D., P.A.**

*Pro Se*

**Certificate of Service**

I served foregoing to Defendants on this 23<sup>th</sup> day of April, 2021 via First Class USPS mail.

*s/Olga P. Blakley*

**Olga P. Blakley M.D., P.A.**

*Pro Se*